

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

Investigation by the Department of Telecommunications	)	
and Energy on its own motion, pursuant to G.L. c. 159	)	
§§12 and 16, into the collocation security policies of Verizon	)	D.T.E. 02-8
New England Inc. d/b/a Verizon Massachusetts	)	

---

**PETITION TO INTERVENE  
OF COVAD COMMUNICATIONS COMPANY**

Pursuant to 220 C.M.R. §1.03(1), Covad Communications Company (“Covad”) hereby petitions the Department of Telecommunications and Energy (“Department”) for leave to intervene as a party in the above-referenced proceeding.

1. Covad is a California corporation with its headquarters at 3420 Central Expressway, Santa Clara, California 95051.
2. Covad is a certificated competitive local exchange carrier (“CLEC”) in the Commonwealth of Massachusetts. Covad collocates telecommunications equipment on Verizon premises pursuant to Section 251(c)(6) of the Communications Act of 1934, as amended (“Act”). *See* 47 U.S.C. § 251(c)(6).
3. Covad’s interests would be substantially and significantly affected by the Department’s review and decision in this docket. Specifically, Covad will be affected by any change in Verizon’s collocation security policies with respect to, but not limited to, the extent and nature of appropriate access by Covad personnel to Verizon’s central office for accessing collocation sites and whether cageless collocation arrangements remain an acceptable security risk.

4. Covad seeks to fully participate in the proceedings in this docket and may, as appropriate, conduct discovery, present witnesses, cross-examine witnesses, present legal arguments, and submit briefs or other pleadings.

5. Covad regretfully was not able to file this petition for leave to intervene by the close of business on Monday, February 11, 2002. Notice of this proceeding was only recently served on Covad by Verizon in a letter dated February 6, 2002.

6. Covad requests that all documents and communications regarding this proceeding be sent to:

Anthony Hansel  
Senior Counsel  
Covad Communications Company  
600 14<sup>th</sup> Street, N.W. Suite 750  
Washington, D.C. 20005  
Tel. (202) 220 - 0410  
Fax (202) 220 - 0401  
thansel@covad.com

WHEREFORE, based upon the foregoing, Covad hereby requests leave to intervene in the proceeding with all rights to participate as a full party.

Respectfully submitted,

---

Anthony Hansel  
Senior Counsel  
Covad Communications Company  
600 14<sup>th</sup> Street, N.W. Suite 750  
Washington, D.C. 20005  
(202) 220 - 0410

Dated: February 15, 2002

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

Investigation by the Department of Telecommunications	)	
and Energy on its own motion, pursuant to G.L. c. 159	)	
§§12 and 16, into the collocation security policies of Verizon	)	D.T.E. 02-8
New England Inc. d/b/a Verizon Massachusetts	)	

---

**MOTION OF COUNSEL TO APPEAR *PRO HAC VICE***

I hereby apply to appear as counsel *pro hac vice* in the above-captioned proceeding. I am a member in good standing of the Maryland and District of Columbia Bars.

Respectfully submitted,

---

Anthony Hansel  
Senior Counsel  
Covad Communications Company  
600 14<sup>th</sup> Street, N.W. Suite 750  
Washington, D.C. 20005  
(202) 220 - 0410

Dated: February 15, 2002